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May 6, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Street, Room 2102  
New York, New York 10007

**Re: Consent Motion for Consolidation of Related Cases**  
**Liberty Specialty Markets Limited et al v. Maersk, Inc. et al.**  
**Case No. 1:19-cv-11373-JAN**  
**Related Case Caption: Sai Marine Export Pvt Limited v. Maersk Line A/S**  
**Related Case No.: 1:19-cv-11364-PAE**

Dear Judge Nathan,

We represent Plaintiff, Liberty Specialty Markets Limited a/s/o Express, Inc. and Express, LLC (hereinafter "Plaintiff"), in the above-referenced case. Pursuant to Your Honor's Individual Practices ¶ 1(C), ¶ 1(H), and Federal Rule of Civil Procedure 42(a), this letter-motion is submitted jointly along with counsel for Defendants, Maersk, Inc., Maersk Line A/S, Maersk Line, Limited, and Maersk Line India Pvt Ltd. (hereinafter and solely for purposes of this letter-motion collectively referred to as "Defendants" and/or "Maersk"). Further, counsel for Plaintiff and Defendant in the Related Case (1:19-cv-11364-PAE) consent to the relief requested herein.

Pursuant to Federal Rule of Civil Procedure 42(a), counsel for Plaintiff and Defendants respectfully request to consolidate the instant matter with the Related Case pending before the Southern District of New York and captioned *Sai Marine Export Pvt Limited v. Maersk Line A/S et al*, Case No. 1:19-cv-11364-PAE. The subject actions both arise from alleged damages and/or losses to shipments of goods carried aboard the M/V Maersk Danube during ocean transit from India to the United States on or around May 2018. (See Compl. [D.E. 1] ¶ 11-17 and Related Case Amend. Compl. [D.E. 7] ¶ 5). Further, the complaints in these actions relate to the same underlying events and assert the same or substantially the same claims.

Based on the foregoing, counsel for Plaintiff and Defendants respectfully submit that consolidations of the actions will serve the interests of judicial economy.

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Should Your Honor have any questions regarding the foregoing, please do not hesitate to contact our office. Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Andrew Spector*

Andrew R. Spector

cc: All Counsel of Record (via *ECF*)

Granted. The cases will be consolidated. The Clerk of Court is also directed to designate 19cv11373 as related to 19cv11364.

SO ORDERED.

*Paul A. Engelmayer*

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PAUL A. ENGELMAYER  
United States District Judge

May 20, 2020